



November 29, 2024

The Hon. Kenneth M. Karas
Federal Building & U.S. Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: Emergency Letter Motion Seeking Adjournment
of 12/10 Pre-Motion Conference [Doc. 45]
Shaffer v. Kavarnos, NYSD Case No. 23-cv-10059-KMK

Dear Judge Karas:

I seek an adjournment of the upcoming conference set for December 10, 2023.

As mentioned in my response letter, I am out of the country from December 2-13 for a long-scheduled vacation. In particular, on December 10, I am unaware of whether I will be in a location with any phone or internet connection. No prior adjournments have been requested. Given I leave the country before I can inquire of opposing counsel's consent and am filing this as an emergency motion, I have not had the chance to hear back—no fault of Mr. Matri's.

Upon my return, I am available other than the morning of December 18, January 9, January 10, and January 27-29.

Finally, I apologize for exceeding the page limits in your individual practices. In my haste to prepare the response within the shortened time frame, I misread your individual practices concerning response page limits. I have noted this in our files and will ensure it does not happen again.

Granted.

Sincerely,

PHILLIPS & BATHKE, P.C., by

s/ Jonathan Phillips

Jonathan LA Phillips

The conference is adjourned to
1/ 9 /25, at 11:30 via

teleconference
So Ordered.

12/2/24

cc. M. Matri (by ECF)